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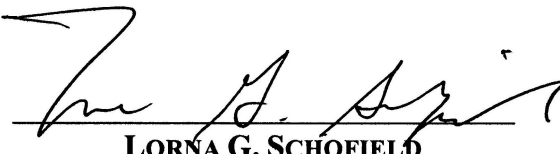
ANDREA L. CALVARUSO

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Application GRANTED in part. The deadline for Defendants Target Corporation, Costco Wholesale Corporation, and Walmart, Inc., to file their Answer is extended from October 15, 2018, to November 30, 2018. The deadline for Defendant TJX Incentives Sales, Inc. to file their Answer is extended from October 24, 2018, to December 6, 2018. The Clerk of Court is respectfully directed to mail a copy of this order to pro se Plaintiff.

Dated: October 11, 2018
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *Daniel Pagan v. Jockey International, Inc., Walmart, Inc., Target Corporation, Costco Wholesale Corporation, and TJX Incentives Sales, Inc., Case No. 18-CV-8539*

Dear Judge Schofield:

We represent Defendants Jockey International, Inc., Walmart, Inc., Target Corporation, Costco Wholesale Corporation, and TJX Incentives Sales, Inc. ("Defendants") in the above-referenced matter. We write with a relevant update regarding the letter motion filed this afternoon requesting an extension to answer, move or otherwise respond to the Complaint. *See* ECF No. 5.

Approximately one hour after filing the letter motion, *pro se* Plaintiff Daniel Pagan responded to our email seeking his consent to the requested extension and provided his consent to same.

Accordingly, the Parties jointly request a sixty day extension of the time to answer, move, or otherwise respond to Plaintiff's Complaint on behalf of all defendants who have been served with Plaintiff's Complaint in the above-referenced matter. In particular, we request that the deadline for Target Corporation, Costco Wholesale Corporation, and Walmart, Inc., to answer, move or otherwise respond to the Complaint be extended sixty days from the current deadline of October 15, 2018, up to and including December 14, 2018; and the deadline for TJX Incentives Sales, Inc. to answer, move or otherwise respond to the Complaint be extended sixty days from the current deadline of October 24, 2018, up to and including December 23, 2018.

October 10, 2018
Page Two

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Andrea L. Calvaruso

Andrea L. Calvaruso

Encl. (Certificate of Service)

cc: Mr. Daniel Pagan (via Federal Express and E-mail)

CERTIFICATE OF SERVICE

I hereby certify that, on October 10, 2018, the foregoing **Defendants' Updated Letter Motion Requesting An Extension to Answer, Move, or Otherwise Respond to Plaintiff's Complaint** was served both via Federal Express and e-mail on Plaintiff Daniel Pagan at the address listed in the Complaint, pursuant to Judge Schofield's Special Rules & Practices in Civil *Pro Se* Cases:

Daniel Pagan
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New York, New York
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info@thelyfestudios.com

/s/ Andrea L. Calvaruso
Andrea L. Calvaruso

Counsel for Defendants